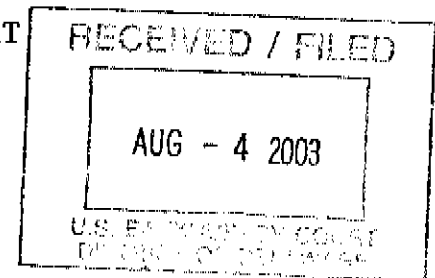


IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE



W. R. GRACE & CO., et, al., 2.
DEBTOR,

v.

EUGENE PAUL SULLIVAN,
Claimant.

)
)
) Case No; 01-01139 (JKF).
) Claim No; 1792
) Claim Date; 8-12-2002
)

MOTION OF DISAGREEMENT

Comes now the Claimant, EUGENE PAUL SULLIVAN, in the above instant case, and would respectfully disagree with the DEBTOR, in that on August 12, 2002, Claimant did file the appropriate/Necessary documentation with subject application, to readily show to the Debtor and the Court that subject Claim was VALID in a respects, However Claimant again attaches hereto an additional copy of the necessary Documentation for all concerned, and would ask the Honorable Court to accept same.

This 30TH day of JULY 2003.

Respectfully submitted

Eugene P. Sullivan
EUGENE PAUL SULLIVAN

Claimant.

CERTIFICATE OF SERVICE:

the undersigned hereby certifies that a true and exact copy of the attached MOTION OF DISAGREEMENT, was forwarded to the below listed, with sufficient postage affixed thereto to carry same by United States MAIL to its addressee.

CO_COUNSEL for the Debtors;
Kirkland & Ellis LLP

200 E. Randolph Drive

Chicago, Illinois 60601

ATTN: James W. Kapp III

Janet S. Baer

Christian Lane

and

Pachulski, Stang, Ziehl, Young, Jones, & Weintraub P.C.

919 North Market Street, 16th Floor

Wilmington, Delaware 19801

ATTN: Scotta E. McFarland

This 30TH day of JULY 2003.



EUGENE PAUL SULLIVAN

Claimant

All responses are to be served upon:

James W. Kapp III, Janet S. Baer, and Christian J. Lane

Kirkland & Ellis LLP

200 East Randolph Drive, Chicago, Illinois 60601 and

Scotta E. McFarland

Pachulski, Stang, Ziehl, Young, Jones & Weintraub, P.C.

919 North Market Street 16th Floor, Wilmington, Delaware 19801

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
)
W. R. GRACE & CO., et al.,¹)
)
Debtors.) Case No. 01-01139 (JKF)
)
) (Jointly Administered)

Hearing Date: August 25, 2003 at 12:00 p.m.

Responses Due: August 8, 2003



SULLIVAN, EUGENE PAUL

FEDERAL MEDICAL CENTER

PO BOX 14500

LEXINGTON KY 40512

02104480512509

Basis For Objection:

NO SUPPORTING DOCUMENTATION

Reason for Proposed Disallowance:

NO DOCUMENTS SUBMITTED TO SUPPORT CLAIM

Claim Data

Case	Claim Number	Claim Date	Total Claim Dollars*	Claim Class**
01-01140	1792	8/12/2002		

NOTICE OF FILING

DEBTORS' SECOND OMNIBUS OBJECTION TO CLAIMS (NON-SUBSTANTIVE)

PLEASE TAKE NOTICE that on or about July 21, 2003, the above-captioned debtors and debtors in possession (the "Debtors") filed the Debtors' Second Omnibus Objection to Claims (Non-Substantive) (the "Second Omnibus Objection") with the United States Bankruptcy Court for the District of Delaware.

¹ The Debtors consist of the following 62 entities: W.R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W.R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W.R. Grace Capital Corporation, W.R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L. B. Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc.), Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

** (A) - Administrative

(S) - Secured

(T) - Total

(P) - Priority

(U) - Unsecured

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.

PLEASE TAKE FURTHER NOTICE that the following parties will receive a copy of the Second Omnibus Objection (with all exhibits): (i) the U.S. Trustee, (ii) the Core Group as defined in the current Case Management Procedures and (iii) the 2002 List. In addition, BMC will serve a copy of the Second Omnibus Objection and a customized Notice summarizing claim detail exactly as reflected in the Exhibit on which such creditor is listed upon those creditors that have filed claims that are affected by the Second Omnibus Objection in lieu of serving all Exhibits. Any party may obtain a copy of the Second Omnibus Objection with all Exhibits or a copy of the Debtors' Declaration in Support of the Objection by requesting the same from BMC at (888)909-0100 or by going onto the BMC website at <http://www.bmccorp.net/wrgrace>.

PLEASE TAKE FURTHER NOTICE that

1. A hearing on the Second Omnibus Objection will be held before the Honorable Judith K. Fitzgerald, United States Bankruptcy Court, 824 Market Street, Wilmington, Delaware on **August 25, 2003 at 12:00 p.m.** (the "Claims Hearing").

2. Any party wishing to oppose the relief requested in the Second Omnibus Objection must file a written response with the Clerk of the U.S. Bankruptcy Court, Sixth Floor, 824 Market Street, Wilmington, Delaware 19801, and serve a copy of the response upon Kirkland & Ellis LLP, Attn: Janet S. Baer, James W. Kapp III, and Christian Lane, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601, and upon Pachulski, Stang, Ziehl, Young, Jones & Weintraub P.C., Attn: Scotta McFarland, Esq., 919 N. Market Street, 16th Floor, P.O. Box 8705, Wilmington, Delaware 19801 so as to be received on or before **August 8, 2003 at 4:00 p.m. (Eastern Time)**. Only those responses timely filed with the Court and received by the Debtors' counsel will be considered by the Court.

3. If no response is filed, served and received by August 8, 2003, at 4:00 p.m. (Eastern Time) the Court will be requested to enter an order, similar to the attached form of proposed order disallowing, expunging, and/or reclassifying the Claim(s) as requested in the Second Omnibus Objection.

4. Any response should contain the following:

- (i) a caption setting forth the name of the Court, the name of the Debtors, the case number and the title of the Objection to which the response is directed;
- (ii) the name and contact information (including daytime telephone number) of the claimant and a description of the basis for the amount of the claim;
- (iii) the claim number(s) of the claim objection(s) to which the response is directed;
- (iv) the specific factual basis and supporting legal argument upon which the party will rely in opposing the Second Omnibus Objection; and
- (v) any supporting documentation, to the extent it was not included with the proof of claim previously filed with the Clerk or Claims Agent, upon which the party will rely to support the basis for and amounts asserted in the proof of claim.

5. If you file a response to the Second Omnibus Objection, you should be prepared to argue that response at the Claims Hearing unless you reach an agreement with the Debtors' counsel to continue or resolve your matter.

6. You need not respond to the Second Omnibus Objection or appear at the Claims Hearing if you do not object to the relief requested in the Second Omnibus Objection. If you do not timely file and serve a response to the Second Omnibus Objection, the relief requested in the Second Omnibus Objection will be granted without further notice to you. Failure to timely file a response to the Second Omnibus Objection shall be deemed (i) waiver of your right to respond to the Second Omnibus Objection and (ii) your consent to the relief requested in the Second Omnibus Objection respecting your Claim.

7. The Debtors reserve the right to object in the future to any of the claims set out in the exhibits or the body of the Second Omnibus Objection on any grounds. Separate notice and hearing will be scheduled for any such objection. **If you have any questions regarding your claim(s) you should contact Bankruptcy Management Corporation at (888) 909-0100. If you have any questions regarding the Second Omnibus Objection, please call Kirkland & Ellis LLP at (312) 616-6202.**

Wilmington, Delaware

Dated: July 21, 2003

Respectfully submitted,

KIRKLAND & ELLIS LLP
James H.M. Sprayregen, P.C.
James W. Kapp III
Janet S. Baer
Christian J. Lane
200 East Randolph Drive
Chicago, IL 60601-6636
(312) 861-2000 (telephone)
(312) 861-2200 (facsimile)

and

PACHULSKI, STANG, ZIEHL, YOUNG,
JONES & WEINTRAUB P.C.

/s/

Laura Davis Jones (Bar No. 2436)
Scotta McFarland (Bar No. 4184)
Paula A. Galbraith (Bar No. 4258)
919 N. Market Street, 16th Floor
P.O. Box 8705
Wilmington, Delaware 19801
(302) 652-4100 (telephone)
(302) 652-4400 (facsimile)



Central Kentucky Radiology, PLLC

David R. Abner, M.D.
 Jerry E. Anderson, M.D.
 John L. Gaudin, M.D.
 Robert A. Davis, M.D.
 Barry C. Hanes, M.D.
 Charles M. Kenney III, M.D.
 Jon K. Koutenc, M.D.
 Christine N. Riley, M.D.
 Thomas T. Tucker, M.D.
 Roy M. Walker III, M.D.
 A. David Westerfield IV, M.D.

CONSULTATION REPORT

Name: EUGENE SULLIVAN
 Requesting Physician: DR. RIOS
 Age: 05/30/52
 History: PREOP
 Exam Requested: PA CHEST

Film #: 54229-053
 Phone #: 255-6812
 Date: 06/19/02

CHEST:

The heart size and pulmonary vascularity are within normal limits. The mediastinum is normal.

There is a cluster of small nodules in the left lung apex. These are not definitely calcified, and a differential diagnosis would include granulomas or less likely metastatic disease.

Recommend correlation to prior chest radiographs or possibly chest CT for further evaluation. No other pulmonary abnormality is identified.

IMPRESSION: LEFT UPPER LOBE NODULES, FAVOR GRANULOMAS, BUT RECOMMEND COMPARISON TO PRIOR CHEST RADIOGRAPHS OR CHEST CT FOR FURTHER EVALUATION.

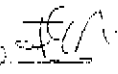

 CHARLES M. KENNEY III, M.D.

CMK/lg

FMC LEXINGTON
 3301 LEESTOWN ROAD
 LEXINGTON, KY 40511-8799

REVIEWED

JUN 24 2002

E. Rios, M.D. 

Do NOT USE

This Restroom until

Further Notice Due To

asbestos. Use the other

Restroom But Not this one.

The whole Thank you,
- Charlie

My is M. Woodridge
used to inmates

cept for the
of crews.
1/unit reg.

6-25-02



Central Kentucky Radiology, PLLC

Dale R. Absher, M.D.
 Jerry E. Anderson, M.D.
 John L. Caudill, M.D.
 Robert A. Davis, M.D.
 Barry D. Haney, M.D.
 Charles M. Kenney III, M.D.
 Joe K. Kostelic, M.D.
 Christine N. Riley, M.D.
 Thomas T. Tucker, M.D.
 Roy M. Waller III, M.D.
 A. David Westerfield IV, M.D.

CONSULTATION REPORT

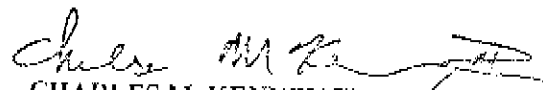
Name: FUGENE SULLIVAN
 Requesting Physician: DR. RIOS
 Age: 05/03/62
 History: A & O PE
 Exam Requested: CHEST

Film #: 54229-053
 Phone #: 255-6812
 Date: 07/13/01

CHEST:

The lungs are clear and there is no evidence of effusion or other pleural disease.
 The cardiac silhouette and mediastinum appear to be normal in size and configuration. The
 bony thorax appears intact.

IMPRESSION: NORMAL CHEST.



 CHARLES M. KENNEY III, M.D.

CMK/ig

FMC LEXINGTON
 3301 LEESTOWN ROAD
 LEXINGTON, KY 40511-8799

REVIEWED

JUL 18 2001

F. Rios, M.D. 

DIAGNOSTIC RADIOLOGY REPORT
VAMC LEXINGTON, KY.

Name: SULLIVAN, EUGENE
SSN: 207-05-3063P
DOB: 05-30-1962

Tech: GREEN, PERRY G
Date: AUG. 1, 2002 09:25
Reported: AUG 1, 2002

Ward/Clinic: X-RAY/CAT SCAN/PMC/CDD
Phy: WOODBRING, JOHN H

Procedure: CT CHEST W/CONTRAST

Case: 2405

(Case 2405 COMPLETE) CT CHEST W/CONTRAST
Proc Modifiers: CONTRAST MEDIA USED
CPT Modifiers: None

(CT Detailed) CPT: 71260

Pharmaceutical: ICHEXOL INJ 240MG I/ML 150 ML BAG

Clinical History:
LUL NODULES

Report:
#54229-053

Status: VERIFIED

CT OF THE CHEST, W/CONTRAST: FOLLOWING ADMINISTRATION OF IV AND ORAL CONTRAST MATERIAL, MULTIPLE AXIAL IMAGES WERE OBTAINED FROM THE THORACIC INLET THROUGH THE LEVEL OF THE ADRENAL GLANDS. THERE ARE SEVERAL TINY NONCALCIFIED NODULES, ONE IN THE RUL, ONE IN THE LUL AND ONE IN THE POSTERIOR BASAL SEGMENT OF THE LLL. THESE COULD REPRESENT EITHER GRANULOMAS OR POSSIBLY METASTASES. THE STUDY IS OTHERWISE UNREMARKABLE.

Impression:

SEVERAL SMALL, NONCALCIFIED PULMONARY NODULES BILATERALLY CONSISTENT WITH EITHER GRANULOMAS OR METASTASES.

Primary Diagnostic Code:

Primary Interpreting Staff:
JOHN H. WOODBRING, M.D., STAFF RADIOLOGIST (Verifier)

DIAGNOSTIC RADIOLOGY REPORT
VAMC LEXINGTON, KY.

Name: SULLIVAN, EUGENE
SSN: 207-05-3062P
DOB: 05-30-1962

Tech: GREEN, FERRY G
Date: DEC 16, 2002 10:37
Reported: DEC 16, 2002

Ward/Clinic: FMC
Phy: WOODRING, JOHN H

Procedure: CT CHEST W/CONTRAST

Case: 153

(Case 153 COMPLETE) CT CHEST W/CONTRAST

(CT Detailed) CPT: 71260

Proc Modifiers: CONTRAST MEDIA USED

CPT Modifiers: None

Pharmaceutical: IOHEXOL INJ 240MG I/ML 150 ML BAG

Clinical History:
NODULES

54229-053

Report:

Status: VERIFIED

PATIENT HAD MULTIPLE BILATERAL PULMONARY NODULES ACCORDING TO PRIOR
PLAIN FILMS AND CAT SCAN DONE ON 08/01/02.

SPIRAL IMAGES WITH MULTISLICE SCANNER WAS PERFORMED AFTER IV AND ORAL
CONTRAST ADMINISTRATION. STUDY COVERED THE AREA BETWEEN THORACIC
INLET THROUGH THE ADRENAL GLANDS. THREE PULMONARY LESS THAN 5 MM
SIZE NODULES AGAIN IS IDENTIFIED. NO SIGNIFICANT CHANGE IN SIZE OR
IN CHARACTER COMPARED TO FIVE MONTHS EARLIER PERFORMED STUDY. THIS
MAKES THE MALIGNANT METASTATIC ORIGIN LESS LIKELY. NO PLEURAL
EFFUSION IS SEEN. REST OF THE STUDY BASICALLY UNREMARKABLE.

Impression:

NO SIGNIFICANT CHANGE. A FURTHER FOLLOWUP IN SIX MONTHS WITHOUT
CONTRAST MAYBE CONSIDERED.

DD: 12/16/02 DT: 12/17/02 INFOPRO /JOB#10807633

Primary Diagnostic Code:

Primary Interpreting Staff:

BENEDMK BOGNAR, M.D., STAFF RADIOLOGIST (Verifier)

/ASC